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Attorneys for Defendant
LOWE'S HIW, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ERIC DENMEAD and GABRIEL
JIMENEZ, individually; and on behalf of all
those similarly situated,

Plaintiffs,

v.

LOWE'S COMPANIES, INC., a North
Carolina corporation; LOWE'S HIW, INC.,
a Washington corporation; and DOES 1
through 20, inclusive,

Defendants.

Case No. C 07 1820 SI

[Hon. Judge Susan Illston]

**STIPULATION AND [PROPOSED]
ORDER TO FILE SETTLEMENT
AGREEMENTS UNDER SEAL**

Courtroom: 10

Complaint Filed: March 30, 2007

1 Plaintiffs Eric Denmead and Gabriel Jimenez ("Plaintiffs") together with Defendant Lowe's
2 HIW, Inc. ("Defendant") (collectively, the "Parties"), by and through their respective counsel of record,
3 hereby agree and stipulate to the entry of the following Stipulation and Proposed Order:

4 WHEREAS, Plaintiffs intend to lodge with the court copies of the confidential individual
5 settlement agreements between Plaintiffs and Defendant ("Settlement Agreements") in this case.

6 WHEREAS, the Parties agree that the Settlement Agreements contain confidential non-public
7 information and have been entered into on a confidential basis; thus, good cause exists for filing the
8 Settlement Agreements under seal.

9 NOW THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiffs and Defendants
10 that the Settlement Agreements be filed under seal in accordance with Local Rule 79-5.

11
12 **IT IS SO STIPULATED.**

13
14 Dated: June 17, 2008

KRUTCIK & GEORGIN

15
16 By s/A. Nicholas Georggin
A. Nicholas Georggin
Attorneys for PLAINTIFFS

17
18
19 Dated: June 17, 2008

AKIN GUMP STRAUSS HAUER & FELD LLP

20 By s/Kevin D. Rising
Kevin D. Rising
Attorneys for Defendants
21 LOWE'S COMPANIES, INC. and LOWE'S HIW, INC

22
23 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

24
25 Dated: _____, 2008



26
27 _____
Hon. Susan Illston
United States District Court Judge